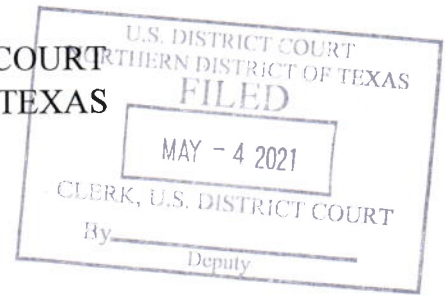


ORIGINAL

SEALED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION



UNITED STATES OF AMERICA, *et al.*
ex rel. ALEX DOE,

Plaintiffs,

v.

PLANNED PARENTHOOD
FEDERATION OF AMERICA, INC.,
PLANNED PARENTHOOD GULF
COAST, INC., PLANNED
PARENTHOOD OF GREATER TEXAS,
INC., PLANNED PARENTHOOD
SOUTHTexas, INC. PLANNED
PARENTHOOD CAMERON COUNTY,
INC., AND PLANNED PARENTHOOD
SAN ANTONIO, INC.,

Defendants.

Civil Action No. 2:19-CV-022-Z

FILED IN SEALED CASE

UNITED STATES OF AMERICA'S UNOPPOSED *EX PARTE*
APPLICATION FOR EXTENSION OF TIME TO DETERMINE
WHETHER TO INTERVENE IN SEALED CASE

For the reasons set forth in the accompanying memorandum, the United States of America ("United States"), on behalf of itself and the States of Texas and Louisiana (Plaintiff States), petitions the Court for an *ex parte* order under the False Claims Act, as amended, 31 U.S.C. § 3730(b)(3), for a 180-day extension from May 7, 2021, through and including November 3, 2021, to determine whether to intervene in this *qui tam* action and to notify this Court of its intervention decision. The United States also seeks an Order that the Complaint and all other filings remain under seal during that time, unless the United States or the Plaintiff States requests that the seal be lifted in whole or in part.

Respectfully submitted,

BRIAN M. BOYNTON
ACTING ASSISTANT ATTORNEY
GENERAL

PRERAK SHAH
ACTING UNITED STATES ATTORNEY



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Attorneys for the United States of America
And on Behalf of the Plaintiff States

CERTIFICATE OF CONFERENCE

I hereby certify that the government contacted Relator's counsel regarding this application and they concur with the relief requested herein.




J. SCOTT HOGAN
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2021, a copy of the foregoing pleading and proposed Order were mailed by first class mail to counsel for relator:

Andrew B. Stephens
Heather Gebelin Hacker
HACKER STEPHENS LLP
108 Wild Basin Rd. South, Suite 250
Austin, Texas 78746



J. SCOTT HOGAN
Assistant United States Attorney



THE UNITED STATES ATTORNEY'S OFFICE *for the*
NORTHERN DISTRICT *of* TEXAS

GWENDOLYN BYERS, *Paralegal Specialist*

1100 Commerce Street, 3rd Floor Telephone: 214.659.8600
Dallas, Texas 75242

May 3, 2021

United States District Clerk
Northern District of Texas
Amarillo Division
205 SE 5th Avenue, Room 133
Amarillo, Texas 79101

Re: Civil Action No. 2:19-CV-022-Z *Sealed Case*

Dear Clerk of the Court:

Enclosed is the original and two copies of the United States of America's Declination Notice to be filed in the above-referenced case. An original and two copies of the Proposed Order are also enclosed.

A pre-addressed, postage paid envelope is enclosed for your use in returning file-marked copies to our office. Please contact me at 214.659.8621 if you have any questions.

Sincerely,

Gwendolyn Byers

Gwendolyn G. Byers, CFE, CFS
Paralegal Specialist